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Sept. 16, 1995

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Office of the Secretary
William F. Caton
Federal Communications Commission
1919 M Street, N.W.
Washington DC, 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Please find enclosed, an original and nine copies of our comments to the
Further Notice of Proposed Rulemaking (PR Docket No. 92-257) in the matter
of

Amendment of the
Commission's Rules
Concerning Maritime
Communications

RM-7956
RM-8031
RM-8352

Thank you,


John Randall

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Dear Mr. Caton:

With this letter we are commenting on the Further Notice of Proposed Rulemaking (PR Docket No. 92-257) in the matter of

Amendment of the	RM-7956
Commission's Rules	RM-8031
Concerning Maritime	RM-8352
Communications	

We object to the proposed rulemaking as put forth in the Further Notice of Proposed Rulemaking adopted May 25, 1995. The particular language that we object to is the proposed new paragraph in section 80.203. Our principle objection is in the adoption of minimum standards for DSC distress and safety calling which are less stringent than the ITU-R M.493-6 classifications. Furthermore, we feel the rule as proposed requiring all marine transmitters manufactured in the United States to have even a substandard DSC capability will place an unnecessary and onerous burden on many of the relatively small domestic suppliers of marine radios. We offer an alternative that will permit full compliance with international Global Marine Distress and Safety System (GMDSS) rules at an early date and will allow radio manufacturers to adapt to the new technology in a much more cost effective manner.

We would like to first deal with the table listing the proposed minimum DSC capabilities. The last column (HF SC101) fails to meet the ITU's minimum standards for MF/HF Transceivers (ITU-R M.493-6 Class E). Specifically HF SC101 fails to list in the receive capabilities: All Ships calls, numerical identification of the station, time and position (for distress calls), and the call category.

The inability to receive All Ships calls could result in ships missing announcements of upcoming broadcasts on safety and weather conditions. This is mitigated perhaps by the requirement to receive geographical area calls. We believe that the US Coast Guard favors geographical area calls to



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announce these sorts of safety related broadcasts. We cannot know however, that this will be the case world wide. The All Ships call is the one sure method of reaching a vessel of unknown identity. The inability to receive an All Ships call could put US ships in grave danger especially when international minimum standards demand such an ability.

We have no objection to demanding a general geographical area call receiving capability in addition to distress relays of this type. This feature is not required by ITU Class E, but clearly has a significant benefit. This will be especially true if the Coast Guard intends to use this type of call for announcing safety calls. We also have no objection to the VHF SC101 where it demands more capability than the ITU's Class F. We agree with the RTCM's assessment of Class F as not meeting satisfactory minimum standards. We agree that the VHF SC101 specifications are well worth adopting since the ability to make individual calls can and should be included. The cost of adding the individual calling capability should be small.

The most significant failing of the HF SC101 requirements however, is the non-inclusion of receive and display capabilities for the identity of a calling ship, the category of the incoming call, and the time and position of a ship in distress. This leaves a ship who has received a distress call with virtually no information other than there is a distress somewhere in the world. Furthermore, the ship has no real ability to participate in DSC distress protocol as stipulated by ITU-R M.493-6 and ITU-R M.541-4.

We understand the reasons for the proposed minimum standards. With no requirements to display anything other than what the radios already have the ability to display, the costs of adding DSC will be reduced. However, this compromise will significantly impact the safety requirements of the individuals and ships on the water. We do not feel that the citizens of the US should go to sea with DSC systems that are inferior to that of the rest of the world.

The counter argument to our position is that the Class E specifications will require significant and costly re-engineering of MF and HF radios, placing an unfair burden on our relatively small domestic marine radio manufacturing industry. There is however, a simple and satisfactory solution to this problem.

Instead of demanding that all MF/HF transmitters have built in DSC capabilities, we propose rules that require all marine (ship and coast stations) MF/HF radio installations include DSC Class E capabilities with the added



requirement of receiving general geographical area calls. This will allow earlier implementation of the rules, since there are already several commercially available DSC systems (including at least 2 domestic suppliers) that may be interfaced to MF/HF radios. With this rule in place, radio manufacturers will eventually build DSC capabilities into their radios since that will be more cost effective in the long run. Furthermore, it will permit them to do it in a more intelligent and cost effective manner. They will be able to integrate the DSC system when their natural redesign cycle occurs.

The current language of the proposed rule making will make obsolete all domestic MF/HF and VHF radios. It will force a short cycle time redesign of the entire line of marine radios. It would be unwise to underestimate the time and effort that will be necessary to implement even the compromised capabilities listed in HF SC101. Very few if any radios on the market have the interfacing, computational, and memory requirements to implement DSC calling as specified by HF SC101. Furthermore, if US radio manufacturers did build radios to these specifications, they would be put at a disadvantage in global markets where such systems would not meet minimum standards. Instead of forcing an untimely redesign that will result in inferior safety capabilities, we believe that the FCC would do much better to regulate radio system capabilities and let system integration take care of itself.

We suggest the following language:

80.203 Authorization of transmitters for licensing.

* * * * *

(n) All marine MF, HF, and VHF radio systems installed on U.S. Ships and coast stations after Feb. 1, 1997 must provide for a minimum DSC requirement in accordance with CCIR Recommendation 493 and 541 as modified in the table below. The DSC capabilities can either be built into the radio transmitter or may be provided by other equipment interfaced to the transmitter. The following table lists the required minimum DSC capabilities for each class of equipment:

For the table entries, we recommend that the Class C column be eliminated, and that the HF SC101 column be replaced by Class E requirements with the added requirement of receiving general geographical area calls.



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We believe that our proposal is superior to the current language of the proposed rulemaking. It mandates radio system capabilities rather than radio manufacturing. It is in the best interest of US citizens going to sea, US companies doing business on the seas and US manufacturers of marine radio equipment.

Individuals and companies will benefit from an earlier implementation of DSC systems on US vessels. The rules will be in full compliance with the international GMDSS regulations. Radio manufacturers will not be faced with the mandated obsolescence of their entire lines of marine radios. System integration of DSC capabilities will be in the interest of radio manufacturers. They will do so according to their own schedules.

Respectfully submitted,

John Randall

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